

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**NORTH AMERICAN COMPANY FOR  
LIFE AND HEALTH INSURANCE,**

**Plaintiff,**

**V.**

**CATHERINE R. PETERSON,**

**EUGENE J. PETERSON, and**

**RAMANU V. BELLO a/k/a  
ROMANO PETERSON a/k/a  
RAMONU PETERSON,**

## Defendants.

**No. 1:08-cv-03504**

## Judge Hibbler

**Magistrate Judge Nolan**

**MOTION TO DEPOSIT ADMITTED LIABILITY**

1. As affirmatively appears from this Court’s file and docket, North American Company for Life and Health Insurance (“NACOLAH”) has filed a complaint for interpleader relief pursuant to 28 U.S.C. §§ 1335, 1397, and 2361 (2008), against Catherine R. Peterson (“Catherine”), Eugene R. Peterson (“Eugene”), and Ramanu V. Bello a/k/a Romano Peterson a/k/a Ramonu Peterson (“Ramanu”) to resolve previously submitted conflicting adverse claims to life insurance benefits due and payable under NACOLAH’s Policy No. 6278340788 insuring Corliss D. McKay (“Insured”) with a face amount of \$180,000 and with a Policy Date of March 1, 1988 (“Policy”).

2. The total admitted liability with respect to the Policy is ONE HUNDRED EIGHTY THOUSAND DOLLARS (\$180,000.00), plus all applicable accrued interest.

3. NACOLAH seeks to deposit this admitted liability in accordance with the proposed order submitted to the Court and the parties separately from this motion.

Respectfully submitted,

NORTH AMERICAN COMPANY FOR  
LIFE AND HEALTH INSURANCE

By: /s/ Morgan J. Milner

Morgan J. Milner  
CHITTENDEN, MURDAY & NOVOTNY LLC  
303 West Madison Street, Suite 1400  
Chicago, Illinois 60606  
312.281.3600 (telephone)  
312.281.36768 (facsimile)

Joseph J. Hasman  
Morgan J. Milner  
Chittenden, Murday & Novotny LLC  
303 West Madison Street  
Suite 1400  
Chicago, Illinois 60606  
(312) 281-3600  
Fax (312) 281-3678

**Certificate of Service**

The undersigned, an attorney, hereby certifies that true and correct copies of the above Notice of Motion and documents described thereto were served upon

Alfred T. Whitters, Esq.  
25 E. Washington Street  
Suite 1217  
Chicago, Illinois 60602

Joe L. Gable, Esq.  
6608 Church Street  
Douglasville, GA 30134

**via U.S. Mail**, by depositing same in the U.S. mail reciprocal located at 303 West Madison Street, Chicago, Illinois on or before the hour of 5:00 p.m., on the **27<sup>th</sup>** day of **June 2008**.

/s/ Morgan J. Milner

CHITTENDEN, MURDAY & NOVOTNY LLC  
303 West Madison Street, Suite 1400  
Chicago, Illinois 60606  
(312) 281-3600  
(312) 281-3678 (fax)  
[mmilner@cmn-law.com](mailto:mmilner@cmn-law.com)